

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
LAREDO DIVISION**

**JAMES KUYKENDALL,**

*Plaintiff,*

*vs.*

**AMAZON STUDIOS, LLC, HECTOR  
BERRELLEZ, JOHN MASSARIA, GOOD  
PIXEL PRODUCTIONS, TILLER  
RUSSELL, and THE INTELLECTUAL  
PROPERTY CORPORATION,**

*Defendants.*

**CIVIL ACTION No. 5:20-cv-00219**

**DECLARATION**

**DECLARATION OF PEDRO T. HERNANDEZ**

I, Pedro T. Hernandez, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am 77 years old and am competent to make this Declaration. I currently reside in Richardson, Texas. The facts stated herein are based on my personal percipient knowledge, including evidence and documents that I have personally reviewed and conversations and meetings and conversations in which I directly participated.

2. I served with the Drug Enforcement Administration (“DEA”) for 11 years, from 1974 to 1986 as a Special Agent. I was stationed in the following field offices: Midland, Texas; Dallas, Texas; Guadalajara, Mexico; and El Paso, Texas.

3. I have known the Plaintiff in this action, former DEA Special Agent James Kuykendall, Sr., who also went by Jaime, since 1969. We began working together at the

DEA in 1982 when we were stationed in Guadalajara. We had a very close working relationship there, with Jaime as my supervisory agent, until I transferred to El Paso, Texas in 1983. I remained in contact with Jaime after leaving Mexico, and we remain friends today.

4. I also worked with DEA Special Agent Enrique “Kiki” Camarena. Prior to his murder, we were close friends, as we had trained together at the DEA Academy and subsequently worked together in Guadalajara. I was godfather to Agent Camarena’s eldest son. The day Agent Camarena was kidnapped, on the morning of February 7, 1985, I called the Guadalajara field office from El Paso. The secretary, Susie, informed me that Kiki was missing. That day, I asked my boss in El Paso for permission to travel to Mexico to assist in any way I could in helping to find Agent Camarena. I left for Guadalajara the following day. In the weeks and months that followed, I worked under Jaime assisting in the initial investigations into Agent Camarena’s disappearance.

5. Tiller Russell reached out to me in Texas via email the night of May 5, 2020, inquiring about several false and horrible allegations concerning Jaime Kuykendall that he planned to publish in a “documentary television series concerning the kidnapping and murder of DEA agent Kiki Camarena.” Russell gave me a deadline to reply – May 6, 2020 at 5:30pm.

6. I replied to Mr. Russell on May 6 from my home in Texas and informed him that the allegations he intended to publish were false, and I also informed him of the often dubious and self-serving nature of information gleaned from trafficker-informants. Mr. Russell acknowledged receipt of my message, and I never heard from him again.

7. Exhibit A is a true and correct copy of the email chain reflecting the above communications between me and Mr. Russell.

8. If I were to appear as a witness at any hearing or trial in this matter, I could and would testify to the above facts.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on this 27<sup>th</sup> day of April, 2021.

  
PEDRO T. HERNANDEZ

Enclosed: Exhibit A, Emails between Hernandez and Russell